

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION

In Re:
Bellany D. Hisbon
xxx-xx-6169
Debtor,

Case No.: **19-80962-CRJ-13**
Chapter **13**

Adversary Proceeding
No.:

Bellany D. Hisbon
Plaintiff,
vs.

U.S. Department of Education
Defendant.

COMPLAINT SEEKING RELEASE OF WAGE LEVY PURSUANT TO
11 U.S.C. SECTION 362

COMES NOW the Debtor, by and through her attorney and moves this Honorable Court to release the Wage Levy now pending on the Debtor's income and for grounds therefore, set out as follows:

1. Debtor filed a Chapter 13 Petition and relief was ordered on March 28, 2019.
2. The following creditor filed a wage levy:

U.S. Department of Education
PO Box 790336
St. Louis, MO 63179-0336

The Debtor's social security number is: **xxx-xx-6169**.

3. The Debtor's payroll information is:
Huntsville Hospital
101 Sivley Road, S.W.
Huntsville, AL 35801

4. The Debtor claimed all future property as exempt.

5. The Debtor represents that the creditor's debt is not for alimony or child support obligation.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this court:

- a. Order Defendant to forthwith release the wage levy to the Debtor;
- b. Order such other relief as it just and proper.

Respectfully submitted,
BOND, BOTES, SYKSTUS,
TANNER & EZZELL, P.C.

/s/ James W. Ezzell, Jr.
Ronald C. Sykstus
Amy K. Tanner
James W. Ezzell, Jr.
Kathryn V. Davis
Attorney for Debtor

OF COUNSEL:

BOND, BOTES, SYKSTUS, TANNER & EZZELL, P.C.
225 Pratt Avenue
Huntsville, Alabama 35801
(256) 539-9899

CERTIFICATE OF SERVICE

I hereby certify that I have on this 1st day of April, 2019, served a copy of the foregoing Complaint on **U.S. Department of Education, PO Box 790336, St. Louis, MO 63179-0336, Huntsville Hospital, Attn: Payroll/Garnishment, 101 Sivley Road, S.W., Huntsville, AL 35801, Internal Revenue Service, Centralized Insolvency Ops, PO Box 7346, Philadelphia, PA 19101-7346, Internal Revenue Service, 801 Tom Martin Drive, Stop 126, Birmingham, AL 35211, Internal Revenue Service, c/o Richard E. O'Neal, Assistant U.S. Attorney, Robert S. Vance Federal Building, Room 200, 1800 5th Avenue North, Birmingham, Alabama 35203, Internal Revenue Service, c/o William Barr, Attorney General, U.S. Department of Justice, Tax Division, 950 Pennsylvania Avenue NW, Washington, D.C. 20530-0001, Internal Revenue Service, PO Box 21126, Philadelphia, PA 19114 and Michele T. Hatcher, Chapter 13 Trustee**, by mailing the same by United States mail properly addressed and First Class Postage prepaid.

/s/ James W. Ezzell, Jr.
OF COUNSEL